

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOUGLAS ALBERT,
Plaintiff
v.
MICHAEL THOMAS, et al,
Defendants

C.A. No. 05-30008-MAP

FILED
IN CLERK'S OFFICE
MAR 21 P 12:37
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MOTION TO CONTINUE PRETRIAL CONFERENCE

The defendant, Michael Thomas, by undersigned counsel, respectfully requests the Pretrial Conference hearing, now scheduled for April 7, 2006, be continued, by agreement, to Wednesday, April 26, 2006 @ 2:00 P.M.

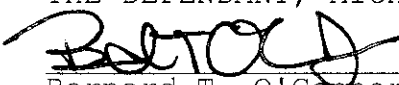
As reasons therefore:

1. The pretrial conference is scheduled for April 7, 2006 at 3:00 P.M.
2. The undersigned counsel will not be available on April 7, 2006, due to a previously scheduled and paid for family vacation day to Rhode Island.

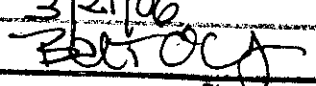
WHEREFORE, Defendant Thomas moves that the Court's continue the Pretrial Conference as requested above.

Date: 3/21/06

RESPECTFULLY SUBMITTED,
THE DEFENDANT, MICHAEL THOMAS


Bernard T. O'Connor, Jr.
O'CONNOR, MARTINELLI, CULLINAN &
PIKULA
1391 Main Street, Suite 1022
Springfield, MA 01103
(413) 781-5311
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I HEREBY CERTIFY THAT A TRUE COPY OF
THE ABOVE DOCUMENT WAS SERVED UPON
(EACH PARTY APPEARING PRO SE AND)
THAT I AM A MEMBER OF THE BAR OF THE
COMMONWEALTH OF MASSACHUSETTS

3/21/06

Signature

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOUGLAS ALBERT,)	
Plaintiff)	
)	
v.)	C.A. No. 05-30008-MAP
)	
MICHAEL THOMAS, et al,)	
Defendants)	

CERTIFICATE OF COMPLIANCE

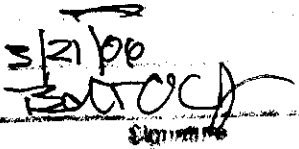
Now comes the Defendant Michael Thomas' counsel and states that on, March 21, 2006, he discussed the issue of the instant Motion to Continue Pretrial Conference with Plaintiff's counsel Robert Astor, who does not oppose the motion and agrees on the new date of April 26, 2006, and attempted to contact other defense counsel J. Thomas Rooke, counsel for City of Chicopee, without success. Attorney Rooke is on vacation. Time being of the essence, this motion is being filed with incomplete compliance, but further attempts will be made.

RESPECTFULLY SUBMITTED,
THE DEFENDANT, MICHAEL THOMAS

Date: 3/21/06

I HEREBY CERTIFY THAT A TRUE COPY OF
THE ABOVE DOCUMENT WAS SERVED UPON

(Signature)

3/21/06




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